

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SONY MUSIC ENTERTAINMENT, et al.,

Plaintiffs,

v.

TRILLER, INC.,

Defendant.

Case No. 22-cv-7380 (PKC)

**DECLARATION OF JEFFREY M. GOULD
IN SUPPORT OF PLAINTIFFS' MARCH 8, 2023 LETTER TO THE COURT**

I, Jeffrey M. Gould, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Oppenheim + Zembrak, LLP (“O+Z”), which represents Plaintiffs Sony Music Entertainment, Sony Music Entertainment US Latin LLC, Arista Records LLC, Provident Label Group LLC, Records Label, LLC, and Zomba Recording LLC (collectively “Sony Music” or “Plaintiffs”) in this action. I make the statements herein based on personal knowledge and/or my review of the documents and information referenced herein. If called upon to do so, I am able to testify competently to the matters set forth below.

2. I submit this declaration in support of Plaintiffs’ March 27, 2023 Letter to the Court.

3. Triller, Inc. (“Triller”) first produced documents in the above-captioned litigation on March 22, 2023 at 5:39 a.m. EDT. The production consisted of approximately 49 documents, comprising 401 pdf pages, one native excel file, and one native email document.

4. None of the documents in Triller's first production were responsive to requests for production 16, 18, 19, 20, 21, and 24, which were the subject of Sony Music's March 1, 2023 letter to the Court. Dkt. 30.

5. Attached hereto as Exhibit A is a true and correct copy of an email chain between counsel for Triller and counsel for Sony Music dated March 22, 2023.

6. On March 22, 2023 at 5:26 p.m. EDT, Triller made a second production of documents, consisting of two documents and 24 pages. One of the documents in Triller's second production is responsive to RFP 19, and the other document is responsive to RFP 24.

7. On March 23, 2023, counsel for Triller and Sony Music met-and-conferred regarding Triller's discovery deficiencies and depositions Sony Music had noticed for March 30, 31, and August 5.

8. During the parties' meet-and-confer, Triller's counsel indicated that Triller would produce an investor capitalization chart and identify Triller's Rule 30(b)(6) corporate designees by the following day, March 24, 2023. Triller's counsel further stated that he hoped, but could not promise, to complete Triller's production by March 28, 2023.

9. As of the time of this filing, Triller has not produced an investor capitalization chart or identified Triller's 30(b)(6) corporate designees.

10. As of the time of this filing, Triller's counsel has not requested Sony Music's consent to an extension of the Court's March 9, 2023 order.

Executed on this 27th day of March 2023 in Washington, D.C.

/s/ Jeffrey M. Gould
Jeffrey M. Gould